

EXHIBIT F

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
3

4 -----)
5 FEDERAL TRADE COMMISSION,)
6 Plaintiff,) CASE NO.
7 vs.) 1:23-cv-06188-ER
8 IQVIA HOLDINGS, INC., and)
9 PROPEL MEDIA, INC.,)
10 Defendants.)
11 -----)
12
13

14 * * C O N F I D E N T I A L * *

15 30(B)(6) VIDEOTAPE DEPOSITION OF THROTTLE, INC.

16 BY WITNESS: PAUL CHACHKO

17 APPEARING REMOTE FROM

18 RED BANK, NEW JERSEY
19

20 OCTOBER 24, 2023

21 1:01 P.M.
22

23 Reported Remotely By:

24 Judith L. Leitz Moran

25 RPR, RSA, CCR-B-2312

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<p>1 REMOTE APPEARANCES OF COUNSEL</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFF:</p> <p>4 FEDERAL TRADE COMMISSION</p> <p>5 BY: YAN GAO, ESQUIRE</p> <p>6 LISA DeMARCHI SLEIGH, ESQUIRE</p> <p>7 600 Pennsylvania Avenue, N W</p> <p>8 Washington, D C 20580</p> <p>9</p> <p>10 ON BEHALF OF THE DEFENDANT IQVIA HOLDINGS, INC. :</p> <p>11 WEIL GOTHALL & MANGES LLP</p> <p>12 BY: LUKE SULLIVAN, ESQUIRE</p> <p>13 2001 M Street, N W</p> <p>14 Washington, D C 20036</p> <p>15</p> <p>16 ON BEHALF OF THE DEFENDANT PROPEL MEDIA, INC ALSO</p> <p>17 KNOWN AS DEEPINTENT:</p> <p>18 MORRISON & FOERSTER LLP</p> <p>19 BY: DAVID J SHAW, ESQUIRE</p> <p>20 2100 L Street, N W</p> <p>21 Suite 900</p> <p>22 Washington, D C 20037</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 I N D E X</p> <p>2 EXAMINATION PAGE</p> <p>3 BY MR. SULLIVAN 7</p> <p>4 BY MR. GAO 39</p> <p>5 BY MR. SULLIVAN 70</p> <p>6 BY MR. GAO 80</p> <p>7</p> <p>8</p> <p>9</p> <p>10 E X H I B I T S</p> <p>11 (EXHIBITS SUBMITTED ELECTRONICALLY)</p> <p>12 THROTTLE EXHIBIT NO. PAGE</p> <p>13 Exhibit 1 Throtle, Inc., Revenue by 27</p> <p>14 Healthcare Clients Spreadsheet</p> <p>15 Healthcare Customer 2023-2024</p> <p>16 (Throtle-0004375.xlsx)</p> <p>17 Exhibit 2 4000 Page Document; Subset 62</p> <p>18 Document - Convertible Note</p> <p>19 Purchase by and between</p> <p>20 Throtle, Inc., and IQVIA,</p> <p>21 Inc. Signing/Closing Date:</p> <p>22 March 22, 2023</p> <p>23 (Throtle-0000001, 0000010,</p> <p>24 0000040)</p> <p>25</p>
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<p>1 REMOTE APPEARANCES OF COUNSEL (CONT.)</p> <p>2</p> <p>3 ON BEHALF OF THROTTLE, INC., AND THE WITNESS:</p> <p>4 FAEGRE DRINKER BIDDLE & REATH, LLP</p> <p>5 BY: KENNETH M. VORRASI, ESQUIRE</p> <p>6 1500 K Street, N.W.</p> <p>7 Suite 1100</p> <p>8 Washington, D.C. 20005</p> <p>9</p> <p>10 ALSO PRESENT:</p> <p>11 * ELLEN HEBERT, VIRTUAL VIDEO TECHNICIAN</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 WITNESS APPEARED REMOTELY FROM RED BANK, NJ</p> <p>2 OCTOBER 24, 2023 - 1:01 P.M.</p> <p>3</p> <p>4 VIDEO TECHNICIAN: Good afternoon. We</p> <p>5 are going on the record at 1:01 p.m.</p> <p>6 The date today is October 24th, 2023.</p> <p>7 Please note that this deposition is being</p> <p>8 conducted virtually. Quality of recording depends</p> <p>9 on the quality of camera and internet connection of</p> <p>10 participants.</p> <p>11 What is seen from the witness and heard</p> <p>12 on screen is what will be recorded. Audio and</p> <p>13 video recording will continue to take place unless</p> <p>14 all parties agree to go off the record.</p> <p>15 This is Media Unit No. 1 of the 30(b)(6)</p> <p>16 video recorded deposition of Throtle, Incorporated.</p> <p>17 The witness's name is Paul Chachko.</p> <p>18 Taken by counsel for Defendants in the</p> <p>19 matter of Federal Trade Commission v. IQVIA</p> <p>20 Holdings, Incorporated and Propel Media,</p> <p>21 Incorporated, filed in the United States District</p> <p>22 Court for the Southern District of New York. Case</p> <p>23 No. 1:23-cv-06188-ER.</p> <p>24 This deposition is being conducted --</p> <p>25 conducted remotely using virtual technology.</p>

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<p>1 My name is Ellen Hebert from Veritext. I</p> <p>2 am the videographer. The court reporter is Judi</p> <p>3 Leitz from Veritext.</p> <p>4 If there are any objections to</p> <p>5 proceeding, please state them at the time of your</p> <p>6 appearance.</p> <p>7 Counsel will now state their appearances</p> <p>8 and affiliations for the record beginning with the</p> <p>9 noticing attorney.</p> <p>10 MR. SULLIVAN: Luke Sullivan on behalf of</p> <p>11 IQVIA.</p> <p>12 MR. SHAW: David Shaw on behalf of Propel</p> <p>13 Media a/k/a DeepIntent.</p> <p>14 MR. GAO: This is Yan Gao on behalf of</p> <p>15 the Federal Trade Commission.</p> <p>16 MR. VORRASI: Again, this is Ken Vorrasi</p> <p>17 of Faegre Drinker, counsel to Throtle and</p> <p>18 Mr. Chachko.</p> <p>19 VIDEO TECHNICIAN: Thank you. Will the</p> <p>20 court reporter please swear in the witness and then</p> <p>21 counsel may proceed.</p> <p>22 PAUL CHACHKO,</p> <p>23 being first duly sworn, was examined as follows:</p> <p>24 MR. CHACHKO: I do.</p> <p>25 THE COURT REPORTER: Okay.</p>	<p>1 or search for content.</p> <p>2 It could be a website, it could be the --</p> <p>3 any sort of website, the open web or within a</p> <p>4 walled garden. But that's where the DSPs connect</p> <p>5 to to actually deploy the media.</p> <p>6 Q Are you familiar with the term "HCP" in</p> <p>7 the advertising context?</p> <p>8 A I am.</p> <p>9 Q Can you describe what that term means?</p> <p>10 A We use it as healthcare professionals.</p> <p>11 Q Okay. And does Throtle provide products</p> <p>12 and services related to digital advertising to</p> <p>13 HCPs?</p> <p>14 A We do.</p> <p>15 Q Can you describe just at a high level for</p> <p>16 now what those products and services are?</p> <p>17 A Yeah, basically they revolve around</p> <p>18 identity. And what I mean by identity is being</p> <p>19 able to identify the user behind any specific</p> <p>20 identification within that user stream, whether it</p> <p>21 would be an IP address or email address, physical</p> <p>22 address, a mobile ad ID.</p> <p>23 And the solutions that we provide to --</p> <p>24 to HCP users would be the identity of those HCP</p> <p>25 candidates, whether they be a healthcare</p>
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<p>1 EXAMINATION</p> <p>2 BY MR. SULLIVAN:</p> <p>3 Q Can you please state your name for the</p> <p>4 record?</p> <p>5 A Paul Chachko.</p> <p>6 Q And what is your title at Throtle?</p> <p>7 A Founder, CEO.</p> <p>8 Q And how long have you worked at Throtle?</p> <p>9 A Since November 2016.</p> <p>10 Q Okay. Can you describe what programmatic</p> <p>11 advertising is?</p> <p>12 A You know, to the best of my ability, it</p> <p>13 may not be right, may not be wrong, but the best of</p> <p>14 my ability is it's the ability to target consumers</p> <p>15 across the open web or within the walled gardens</p> <p>16 using specific information to target them.</p> <p>17 Identify and target them.</p> <p>18 Q Okay. Can you describe what a DSP is?</p> <p>19 A It's a demand-side platform. It's where</p> <p>20 advertisers come to gather audiences to distribute</p> <p>21 media to them whether for advertising or marketing</p> <p>22 purposes.</p> <p>23 Q Can you describe what an SSP is?</p> <p>24 A That's a supply-side platform where the</p> <p>25 consumers are actually showing up to read content</p>	<p>1 professional that's a doctor or a healthcare</p> <p>2 professional that's something other than a doctor,</p> <p>3 we can provide that identity in an accurate way.</p> <p>4 We provide activation services which</p> <p>5 means we are hooked to a number of DSPs and</p> <p>6 connected and integrated with a number of DSPs that</p> <p>7 allow for us to i- -- understand what their --</p> <p>8 where they are locating these consumers. And then</p> <p>9 we tie the two together.</p> <p>10 It's a fairly sophisticated --</p> <p>11 sophisticated capability.</p> <p>12 And then once we identify an HCP, we have</p> <p>13 them in our graphs and we have an integration and a</p> <p>14 sync with a DSP, we're able to assist the</p> <p>15 advertiser in being able to target that advertiser</p> <p>16 for, again, advertising or marketing.</p> <p>17 And then with that provide ancillary</p> <p>18 services like measurement and log reporting, we can</p> <p>19 enhance data, we can do a host of analytical</p> <p>20 capabilities.</p> <p>21 But it all starts for us with the</p> <p>22 identity of -- of that particular HCP.</p> <p>23 Q Okay. And how -- strike that.</p> <p>24 How big do you view the market for</p> <p>25 programmatic advertising to HCPs?</p>

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<p>1 MR. GAO: Objection, foundation.</p> <p>2 A I've seen some -- some research reports</p> <p>3 that are in the 20 plus billion just specific for</p> <p>4 HCPs and healthcare programmatic marketing. And</p> <p>5 that's out of a broader market of, you know,</p> <p>6 probably a hundred and -- hundred plus billion.</p> <p>7 So it's fairly sizable market.</p> <p>8 BY MR. SULLIVAN:</p> <p>9 Q Okay. And can programmatic advertising</p> <p>10 to HCPs occur in multiple digital advertising</p> <p>11 channels?</p> <p>12 A Oh, yeah. Yep.</p> <p>13 Q Can you just, you know, identify what</p> <p>14 those channels are?</p> <p>15 A Sure. So there's HCP availability in</p> <p>16 DSPs, and you have DSPs that are wholly focused on</p> <p>17 -- on HCP. And then you have DSPs that are more</p> <p>18 broad based and vertically agnostic.</p> <p>19 And then you have social media channels.</p> <p>20 You have mobile channels. You have CTV channels.</p> <p>21 So within each of those channels, there's</p> <p>22 providers of services to deploy that media from a</p> <p>23 DSP perspective.</p> <p>24 And Throttle's position in that -- that</p> <p>25 world is we connect to everybody.</p>	<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 BY MR. SULLIVAN:</p> <p>17 Q Okay. So is it fair to say that Throttle</p> <p>18 is focused on ensuring it -- you know, it's</p> <p>19 integrated with the partners that it views as the</p> <p>20 biggest and most important for advertising to HCPs?</p> <p>21 MR. GAO: Objection, form, leading.</p> <p>22 A You know, our -- our job is to be an</p> <p>23 independent provider of services, right?</p> <p>24 So whoever comes to us from a healthcare</p> <p>25 perspective and wants to deliver their -- their</p>
Page 11	Page 13
<p>1 So if a client comes to us and says, we</p> <p>2 would like to send data to a specific, you know,</p> <p>3 HCP-focused DSP, we can do that. If they want to</p> <p>4 do it to a nonspecific HCP, we can do that.</p> <p>5 If they want to send it down a social</p> <p>6 media channel, that, you know, obviously is across</p> <p>7 all verticals, we can do that. Across all mobile</p> <p>8 networks, we can do that. Or if we want to put it</p> <p>9 in the -- in the CTV channel, we can do that.</p> <p>10 So, you know, from a Throttle perspective,</p> <p>11 our job is to be able to identify those HCPs and do</p> <p>12 the distribution across all of the -- the</p> <p>13 associated channels that they're available in.</p> <p>14 Q And can HCP programmatic advertising</p> <p>15 occur in all of the channels that you just listed?</p> <p>16 A Yeah.</p> <p>17 MR. GAO: Objection, form, foundation.</p> <p>18 BY MR. SULLIVAN:</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>1 media to a certain DSP or social media channel or</p> <p>2 whatever channel they're trying to reach, our job</p> <p>3 is to make sure we are connected and integrated</p> <p>4 with all of them that make sense.</p> <p>5 If a big client comes to us and says,</p> <p>6 we'd like you to go to a channel that we're not</p> <p>7 currently connected -- or a -- a platform that</p> <p>8 we're not currently connected to, between the</p> <p>9 client and us we will get connected to that new --</p> <p>10 new platform, stand them up and be able to deliver</p> <p>11 that data for the client there.</p> <p>12 So we're not looking to be connected to</p> <p>13 every single one, but we're looking to be connected</p> <p>14 to all the ones that matter.</p> <p>15 BY MR. SULLIVAN:</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

<p style="text-align: right;">Page 14</p> <p>1 [REDACTED] 2 [REDACTED] 3 [REDACTED] 4 [REDACTED] 5 [REDACTED] 6 [REDACTED] 7 [REDACTED] 8 [REDACTED] 9 [REDACTED] 10 [REDACTED] 11 Q Okay. And you described around 2020 -- 12 before 2022, Throtle had a more general focus and 13 since then it has begun to focus more exclusively 14 on healthcare; is that right? 15 A Correct. 16 MR. GAO: Objection, form. 17 BY MR. SULLIVAN: 18 Q Have you seen other companies in the HCP 19 programmatic space make a similar transition from 20 being more generally focused to focusing, you know, 21 more specifically on healthcare? 22 MR. GAO: Objection, form, foundation, 23 leading. 24 A I haven't. There -- there -- at least as 25 it pertains to what we do for a business, which I</p>	<p style="text-align: right;">Page 16</p> <p>1 services related to audience creation? 2 A Yes. 3 Q Could you describe -- 4 A Broadly speaking. Broadly speaking. 5 Yeah, so Throtle assists our clients who 6 already have existing data, whether they have an 7 NPI list, whether they have an HCP list. Sometimes 8 those lists are partial, they're incomplete, 9 they're inaccurate. 10 We work across the spectrum of clients to 11 bring that data in and do the work that we need to 12 do on our side to fix that data, repair that data, 13 make that data stronger, more accurate, more 14 useful. 15 So from that standpoint, you know, we 16 have a -- we have a role in the audience creation, 17 but Throtle doesn't have data per se that we own, 18 that we sell, that we create audiences and market 19 audiences and knock on doors and say "buy our 20 data." We don't do that, that's not our business. 21 We're -- we're -- we're the intermediary, 22 we're the middleman between, you know, those who 23 have data and want to utilize that data in an -- in 24 an intelligent, accurate way and distribute that 25 data to DSPs or, you know, CTV social channels or</p>
<p style="text-align: right;">Page 15</p> <p>1 think is -- is fairly well understood within the 2 eco system, it's really complex what we do. 3 And on top of that, you know, layer on 4 the healthcare concerns for, you know, the 5 treatment of data, HIPAA, you know, security, 6 privacy, et cetera, you have to be good at what you 7 do to do it. 8 So to do what we do specifically and -- 9 and exclusively, I think as a general provider you 10 don't have the same -- you don't address it the 11 same. You sort of look at it as, like, yeah, we 12 can do it, but we're not going to focus and really 13 be a provider there. 14 But, you know, I'm speaking on the 15 identity side. The identity is really different. 16 BY MR. SULLIVAN: 17 Q Okay. And do you -- you know, on the 18 identity side, does Throtle still compete with 19 other identity solutions that have a more general 20 focus? 21 A We do. 22 MR. GAO: Objection, form. 23 A We do. 24 BY MR. SULLIVAN: 25 Q Okay. Does Throtle provide products and</p>	<p style="text-align: right;">Page 17</p> <p>1 wherever else. 2 Q Okay. And so a customer of Throtle could 3 bring a list of NPIs, for example, to Throtle and 4 upload it and Throtle would clean up the data and 5 enable it to be used in HCP programmatic 6 advertising; is that right? 7 MR. GAO: Objection, form, leading, 8 mischaracterizes testimony. 9 A Yes, that's what we do. We help the 10 industry, the healthcare community to work on their 11 data so their data is more useful, more accurate, 12 more responsive than it would be if we weren't 13 involved in the process. 14 BY MR. SULLIVAN: 15 Q Okay. And you mentioned different types 16 of clients before. What types of clients bring NPI 17 lists to Throtle to create audiences of HCPs? 18 A Almost everybody. It could be a brand 19 like a pharma brand. 20 It could be a -- a consumer-focused 21 company that is an insurance, you know, so, you 22 know, whether it's an Aetna or Blue Cross or 23 something like that. 24 It could be a -- a data company that has 25 compiled these lists of NPIs that are old and stale</p>

<p style="text-align: right;">Page 18</p> <p>1 and they needed them updated.</p> <p>2 They could be an analytics company that's</p> <p>3 having trouble seeing this data from a response</p> <p>4 perspective and they want to model the responses</p> <p>5 and they need help kind of attaching old data to</p> <p>6 new data, and what is that connection between the</p> <p>7 data types.</p> <p>8 Certainly agencies.</p> <p>9 So, you know, I guess when you look at</p> <p>10 the healthcare community of -- of programmatic</p> <p>11 clients and -- and users, they all do it.</p> <p>12 Q Okay. And you mentioned insurance</p> <p>13 companies in your answer.</p> <p>14 Is it fair to say that not only -- or</p> <p>15 strike that.</p> <p>16 Do companies other than, like,</p> <p>17 pharmaceutical manufacturers bring NPI lists to</p> <p>18 Throttle to engage in HCP programmatic advertising?</p> <p>19 A At times, yeah.</p> <p>20 Q And can you describe some examples of the</p> <p>21 type of companies that do that?</p> <p>22 A Yeah. So when you have insurance</p> <p>23 companies or you have somebody other than a brand</p> <p>24 wanting to reach healthcare providers, they're</p> <p>25 either going to come with a list of NPIs that</p>	<p style="text-align: right;">Page 20</p> <p>1 want to market to a group of individuals that make</p> <p>2 up an audience in the programmatic world, you can't</p> <p>3 just -- you know, it's not like taking a set of</p> <p>4 data and going to a mail house and say mail it to</p> <p>5 this group of folks.</p> <p>6 That data has to be put into a position</p> <p>7 where we can find them on a digital footprint, and</p> <p>8 that's where identity comes in.</p> <p>9 So once we, you know, have the correct</p> <p>10 identity of an individual in a digital way and</p> <p>11 that's, you know, whether using an IP address,</p> <p>12 email address, physical address, a mobile ad ID, a</p> <p>13 cookie, whatever the case -- case may be, we are</p> <p>14 integrated with all of the platforms that I said,</p> <p>15 you know, in -- in the prior question.</p> <p>16 And when I say "integrated," you know, we</p> <p>17 have an ID of a specific user. They have an ID of</p> <p>18 a specific user. We integrate those two, so we</p> <p>19 both share that ID now. We have their ID, they</p> <p>20 have our ID.</p> <p>21 When a client comes to us with a list or</p> <p>22 a set of data and wants to bring that data to an</p> <p>23 endpoint, a destination, a DSP, if you will, the --</p> <p>24 the function of matching those two data sets, the</p> <p>25 one that is in our systems with the one that is in</p>
<p style="text-align: right;">Page 19</p> <p>1 they've curated somewhere or they've -- they've</p> <p>2 generated through their own practice.</p> <p>3 And practice, I don't mean healthcare</p> <p>4 practice practice, meaning their business practice.</p> <p>5 A client of theirs brought it to them and they want</p> <p>6 to do a program against that, so.</p> <p>7 And really the generation of the data</p> <p>8 comes from everywhere and from, you know, insurance</p> <p>9 folks to pharma folks to data folks to agencies.</p> <p>10 Whoever wants to reach that healthcare</p> <p>11 practitioner. And it doesn't have to be, you know,</p> <p>12 a hundred percent doctors, it could be, you know,</p> <p>13 down the line from doctors.</p> <p>14 The -- the -- the service that we provide</p> <p>15 is being able to accurately figure out those NPIs,</p> <p>16 who they're associated with, and be able to provide</p> <p>17 that programmatic linkage back to the DSPs or the</p> <p>18 channel that they want to market to.</p> <p>19 And our quote/unquote expertise is being</p> <p>20 able to do that very accurately.</p> <p>21 Q Okay. You mentioned activation earlier.</p> <p>22 Can you just describe in a bit more detail the</p> <p>23 products and services that are related to</p> <p>24 activation that Throttle offers?</p> <p>25 A Yeah. So when -- when you -- when you</p>	<p style="text-align: right;">Page 21</p> <p>1 the platform system is called activating it.</p> <p>2 So when we talk about activating</p> <p>3 audiences, we talk about accurately taking an</p> <p>4 audience from a client, finding and -- and</p> <p>5 associating that data with the platform's data.</p> <p>6 And then the platform is able to now</p> <p>7 deploy media whenever they see that particular</p> <p>8 piece of data show up in the digital eco system or</p> <p>9 the digital industry.</p> <p>10 Q So Throttle can activate an audience of</p> <p>11 HCPs on any of the, you know, channels or partners</p> <p>12 with which it is integrated; is that correct?</p> <p>13 A That's correct.</p> <p>14 MR. GAO: Objection, form,</p> <p>15 mischaracterizes the testimony.</p> <p>16 BY MR. SULLIVAN:</p> <p>17 Q And we discussed earlier that Throttle</p> <p>18 integrated with partners on all different types of</p> <p>19 channels, such as social media, DSPs, connected TV,</p> <p>20 video and others; is that right?</p> <p>21 A Correct.</p> <p>22 MR. GAO: Objection, form,</p> <p>23 mischaracterizes the testimony.</p> <p>24 BY MR. SULLIVAN:</p> <p>25 Q So on all of those channels, Throttle can</p>

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<p>1 LiveRamp -- Throttle can -- sorry, strike that.</p> <p>2 On all -- on all of those channels,</p> <p>3 Throttle can activate an audience of HCPs to enable</p> <p>4 programmatic advertising; is that correct?</p> <p>5 MR. GAO: Objection, form,</p> <p>6 mischaracterizes testimony, leading.</p> <p>7 A Hundred percent, yes.</p> <p>8 BY MR. SULLIVAN:</p> <p>9 Q And is -- would you categorize the</p> <p>10 advertising on all of those channels as one-to-one</p> <p>11 HCP programmatic advertising?</p> <p>12 MR. GAO: Objection, form.</p> <p>13 A That's a good question. We know when we</p> <p>14 do it. When we -- we -- we know when we're</p> <p>15 providing these activations it's -- it's a</p> <p>16 deterministic match.</p> <p>17 So I would say, yes, you know, as far as</p> <p>18 Throttle's concerned, that's an accurate statement.</p> <p>19 BY MR. SULLIVAN:</p> <p>20 Q Okay. And you mentioned</p> <p>21 healthcare-focused DSPs and -- and a vertically</p> <p>22 agnostic DSPs earlier. Do you remember that?</p> <p>23 A I do.</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>1 HCPs on a general DSP, those general DSPs are</p> <p>2 engaging an HCP programmatic advertising on a</p> <p>3 one-to-one basis; is that correct?</p> <p>4 MR. GAO: Objection, form, leading,</p> <p>5 foundation.</p> <p>6 A Yes.</p> <p>7 BY MR. SULLIVAN:</p> <p>8 Q Okay. Can you describe the measurement</p> <p>9 services that Throttle offers in connection with HCP</p> <p>10 programmatic advertising?</p> <p>11 A Yeah, we -- we actually don't provide the</p> <p>12 end result of measurement or the end result of</p> <p>13 analytics.</p> <p>14 We support measurement companies and</p> <p>15 analytic companies with getting the raw data they</p> <p>16 need to make their -- their assumptions or their --</p> <p>17 their conclusions.</p> <p>18 So we sit in the middle between the DSPs</p> <p>19 and the log reports and the websites and the -- the</p> <p>20 visitations they get.</p> <p>21 And we're able to tie all of that data</p> <p>22 together back to the audience that was originally</p> <p>23 deployed, the media, and provide that raw data back</p> <p>24 to folks that do that work.</p> <p>25 From a competitive standpoint, could we</p>
Page 23	Page 25
<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 BY MR. SULLIVAN:</p> <p>19 Q And Throttle today activates audiences of</p> <p>20 HCPs on other general and nonhealthcare-focused</p> <p>21 DSPs; is that correct?</p> <p>22 MR. GAO: Objection, form, leading.</p> <p>23 A Yes.</p> <p>24 BY MR. SULLIVAN:</p> <p>25 Q And when Throttle activates an audience of</p>	<p>1 do it, yep, we could do it all day long. From a</p> <p>2 decisioning standpoint, it's just not something</p> <p>3 that we're -- we're interested in proceeding right</p> <p>4 now.</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

[illegible]

Age Group	Percentage
18-24	85%
25-34	25%
35-44	85%
45-54	95%
55-64	85%
65+	25%

8 (Deposition Throttle Exhibit 1 marked.)

9 BY MR. SULLIVAN:

10 Q Okay. I'm going to introduce a document
11 now. You should see it on your screen or in
12 Exhibit Share in just a second here.

13 I think it will not have the exhibit
14 stamp because it is an Excel document.

15 It has the Bates number, just for the
16 record, Throttle-0004375.

17 Let me know when you see that document.

18 MR. VORRASI: Luke, are you going to put
19 that on the screen, the Zoom screen, or should we
20 get it through that other site?

21 MR. SULLIVAN: I was just going to have
22 you get it through the Exhibit Share if that works.

23 MR. VORRASI: That's really, Paul, up to
24 you.

25 MR. SULLIVAN: If it's easier, I could do

1 it on my screen, too.

2 A It would be easier for me if you put it
3 up on the screen here versus --

4 BY MR. SULLIVAN:

5 Q Sure, sure.

6 A -- logging into something else. I will
7 undoubtedly screw it up.

8 Q Let me try to do that right now.

9 Do you see the document on the screen?

10 A Yes.

11 Q Okay. Let me try to zoom out so you can
12 see the whole thing. Is that visible now for you?

13 A Yes, sir.

14 Q Okay. Do you recognize this document?

15 A I do.

16 Q Can you describe what it is?

17 A Yeah, this was an exhibit I put together
18 when Ken asked me to identify the healthcare
19 clients we currently have, what the revenue is that
20 we're generating by each of these clients, and the
21 type of revenue.

22 So I assembled this last week just to
23 give him a quick snapshot of what we have as
24 current clients and what we have as upcoming
25 clients.

1 Q And do you see the top of the document
2 says "Healthcare Clients"?

3 A I do.

4 Q So is this just a kind of subset of
5 healthcare clients that work in the healthcare
6 vertical?

7 A Yes.

8 Q Okay. And there are a couple of
9 different -- under -- in column E, it says "Type"
10 and they are different entries there.

11 Can you describe the type of work that is
12 performed for the entries labeled DSP?

13 A The type of work that we do for the label
14 DSP?

15 0 Yes.

16 A Yeah. So there's a variety of things we
17 provide for the DSPs. The most common one is just
18 the pure activation.

19 So where we would have a sync with that
20 particular platform, an ID sync, and we're able to
21 go ahead and send data over, audiences over, so
22 they can deploy media to them.

23 So that's -- that's the -- you know, the
24 bare bones relationship we would have then. Once
25 we get a partner, they give us an audience, we

<p style="text-align: right;">Page 30</p> <p>1 activate that audience to the platform, the</p> <p>2 platform puts the data in, the partner seat on that</p> <p>3 platform, then the partner can deploy the media</p> <p>4 they want to that particular audience that they've</p> <p>5 -- they've asked us to activate.</p> <p>6 We also license our data graph, our --</p> <p>7 our consumer graph to a lot of these DSPs in the</p> <p>8 healthcare and nonhealthcare space.</p> <p>9 And the reasoning for that is gives them</p> <p>10 a better understanding of the data that they're</p> <p>11 receiving on their side to pair that up with our</p> <p>12 graph and be able to create an identity for that</p> <p>13 particular feed that's coming in, that digital feed</p> <p>14 that's coming in.</p> <p>15 So instead of being able to say we don't</p> <p>16 know anything about this person or this particular</p> <p>17 digital element, they can match it up against their</p> <p>18 graph and be able to actually identify it.</p> <p>19 We do log reporting. So the data that's</p> <p>20 actually being deployed -- or the media that's</p> <p>21 actually being deployed to that data is logged on</p> <p>22 these DSPs and those DSPs oftentimes send us those</p> <p>23 log reports.</p> <p>24 We're able to associate that back to the</p> <p>25 -- the data and the audience that we had activated.</p>	<p style="text-align: right;">Page 32</p> <p>1 purposes and connect with a lot of new DSPs to</p> <p>2 create APIs and faster channels to get audiences</p> <p>3 over to them.</p> <p>4 So behind the scenes of products there's</p> <p>5 a lot of, you know, technical servicing that we do</p> <p>6 with DSPs.</p> <p>7 Q Okay. And on the -- you mentioned</p> <p>8 reporting in the answer on enabling clients to see</p> <p>9 who clicked on an advertisement; is that right?</p> <p>10 MR. GAO: Objection, form.</p> <p>11 BY MR. SULLIVAN:</p> <p>12 Q Does Throttle work with a broad variety of</p> <p>13 partners to enable them to, you know, have</p> <p>14 reporting that shows which person clicked on an</p> <p>15 advertisement?</p> <p>16 MR. GAO: Objection, form.</p> <p>17 A Oh, we do. And -- and Ken, you might</p> <p>18 want to jump in here because the -- the exhibit</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 And so to answer your question, yes, so</p> <p>25 we work, Luke, with customers that are within</p>
<p style="text-align: right;">Page 31</p> <p>1 And we can send that data back to our</p> <p>2 measurement partners, our clients, our agencies,</p> <p>3 our analytical partners, and they can do whatever</p> <p>4 kind of number crunching they want with who's</p> <p>5 actually been deployed, the media that -- that's</p> <p>6 been intended.</p> <p>7 Same thing on the -- the pixel side of</p> <p>8 this equation.</p> <p>9 So a DSP would deploy media to an</p> <p>10 audience, somebody in that audience would click on</p> <p>11 that media. When they click on that media, they go</p> <p>12 to a website. We have a tag on that website.</p> <p>13 We're able to identify who on that audience clicked</p> <p>14 on that website.</p> <p>15 And same as the log reports, we're able</p> <p>16 to take that information and send it back to our</p> <p>17 clients, the analytical company, the measurement</p> <p>18 company, whoever, so they can identify not only who</p> <p>19 has deployed the media, they can actually know who</p> <p>20 actually activated or created an action against</p> <p>21 that -- that particular media that was deployed to</p> <p>22 them.</p> <p>23 Q Okay.</p> <p>24 A Yeah. And so, I mean, and then we just</p> <p>25 license a lot of other data to DSPs for identity</p>	<p style="text-align: right;">Page 33</p> <p>1 healthcare and across all verticals that are not</p> <p>2 healthcare -- healthcare focused.</p> <p>3 BY MR. SULLIVAN:</p> <p>4 Q Okay. And you mentioned a different</p> <p>5 spreadsheet. So does Throttle track -- or strike</p> <p>6 that.</p> <p>7 This spreadsheet only reflects DSPs, for</p> <p>8 example, that are healthcare-focused DSPs that</p> <p>9 Throttle works with; is that right?</p> <p>10 MR. GAO: Objection, form,</p> <p>11 mischaracterizes testimony.</p> <p>12 A This list doesn't focus specifically on</p> <p>13 DSPs, it focuses on just revenue by a healthcare</p> <p>14 client. So if the client is in the healthcare</p> <p>15 vertical, they'll be on this list.</p> <p>16 There's another list I created that is</p> <p>17 revenue by clients that generate healthcare</p> <p>18 revenue.</p> <p>19 So, for instance, The Trade Desk would be</p> <p>20 in that list, and we generated a ton of revenue</p> <p>21 from The Trade Desk, but they're across all</p> <p>22 verticals so they weren't on this initial list.</p> <p>23 They were on a list that was more</p> <p>24 exaggerated than this one from a -- from a</p> <p>25 healthcare revenue standpoint.</p>

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1 BY MR. SULLIVAN:
 2 Q Okay. So general -- general DSPs that
 3 work in multiple verticals, including healthcare,
 4 Throtle generated revenue from them, but it's not
 5 included on this spreadsheet; is that true?
 6 A That's correct.
 7 MR. GAO: Objection, form.
 8 BY MR. SULLIVAN:
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 [REDACTED]
 15 [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 MR. SULLIVAN: Okay. Can we take a

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1 five-minute break and go off the record.
 2 VIDEO TECHNICIAN: Going off the record.
 3 The time is 1:39 p m.
 4 (Recess taken.)
 5 VIDEO TECHNICIAN: Going back on the
 6 record. The time is 1:52 p m.
 7 BY MR. SULLIVAN:
 8 Q Mr. Chachko, before the break we
 9 discussed a spreadsheet that listed healthcare
 10 clients of Throtle's. Do you remember that?
 11 A Yes.
 12 Q And you mentioned that Throtle tracks in
 13 a different spreadsheet revenue it generates from
 14 nonhealthcare clients. Do you remember that?
 15 A Yes.
 16 [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 MR. SULLIVAN: Okay. I'm just going to
 22 state for the record that Defendants believe that
 23 spreadsheet that lists nonhealthcare clients is
 24 responsive to our subpoena and we would like to
 25 have that produced.

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1 MR. GAO: FTC objects to documents that
 2 are prepared and/or produced after this deposition.
 3 MR. SULLIVAN: Okay.
 4 MR. VORRASI: Luke, your request is
 5 noted, I'll leave it at that.
 6 MR. SULLIVAN: Thank you.
 7 BY MR. SULLIVAN:
 8 Q Before our break we also discussed how
 9 Throtle can activate an audience of HCPs to engage
 10 in HCP programmatic advertising on general DSPs.
 11 Do you remember that?
 12 A Yes.
 13 MR. GAO: Objection, misstates testimony,
 14 form.
 15 BY MR. SULLIVAN:
 16 Q And you provided some examples of general
 17 DSPs that Throtle has activated HCP audiences on.
 18 Do you remember that?
 19 A Yes.
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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1 [REDACTED]
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 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 Q Okay. So Throtle, for all of the DSPs

<p style="text-align: right;">Page 38</p> <p>1 that you mentioned previously and now, whether they</p> <p>2 are general DSPs or healthcare-focused DSPs,</p> <p>3 Throttle serves audiences of HCPs to those DSPs and</p> <p>4 activates it in order for those DSPs to conduct</p> <p>5 programmatic advertising to HCPs on a one-to-one</p> <p>6 basis; is that correct?</p> <p>7 MR. GAO: Objection, form, leading,</p> <p>8 mischaracterizes testimony.</p> <p>9 A It's a hundred percent correct, yeah.</p> <p>10 MR. SULLIVAN: Okay. I will reserve the</p> <p>11 rest of my time for rebuttal and give the witness</p> <p>12 to the FTC.</p> <p>13 MR. GAO: Thank you.</p> <p>14 Can we get a quick time check on how much</p> <p>15 time Defendants have used?</p> <p>16 MR. VORRASI: You want to go off the</p> <p>17 record?</p> <p>18 MR. GAO: Yeah, that would be great.</p> <p>19 VIDEO TECHNICIAN: Going off the record.</p> <p>20 The time is 1:56 p m.</p> <p>21 (Off the record.)</p> <p>22 VIDEO TECHNICIAN: Going back on the</p> <p>23 record. The time is 1:57 p m.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 40</p> <p>1 support services for HCP programmatic marketing.</p> <p>2 But, you know, we're part of the value chain, but</p> <p>3 we're not a DSP.</p> <p>4 Q What do you mean when you say "support</p> <p>5 services"?</p> <p>6 A So I -- I -- you know, I said it in my</p> <p>7 prior testimony here that we provide identity.</p> <p>8 So ensuring that the audiences that are</p> <p>9 coming in that are not digital and are not yet</p> <p>10 activated, that we can work with that data to</p> <p>11 create a stronger data set, more accurate data set,</p> <p>12 be able to activate that data set which means, you</p> <p>13 know, make sure we have the proper IDs associated</p> <p>14 with which whatever DSP we're utilizing so that DSP</p> <p>15 and the clients thereof will have audiences</p> <p>16 available to them on their chosen DSP to do the</p> <p>17 media exposure that they want to send.</p> <p>18 So we're, if you will, the -- the conduit</p> <p>19 from off line data and information to activate it</p> <p>20 to become available in the digital eco system.</p> <p>21 Q When you talk about Throttle helping to</p> <p>22 activate data, what do you mean by "activate"?</p> <p>23 A Yeah. So activate is taking a -- a -- a</p> <p>24 piece of data. Let's just call it an off line</p> <p>25 audiences and for this purpose HCP.</p>
<p style="text-align: right;">Page 39</p> <p>1 EXAMINATION</p> <p>2 BY MR. GAO:</p> <p>3 Q Good afternoon, Mr. Chachko.</p> <p>4 Previously you and defense counsel</p> <p>5 discussed DSPs. Do you remember that?</p> <p>6 A I do.</p> <p>7 Q Is Throttle a DSP?</p> <p>8 A No.</p> <p>9 Q What differentiates Throttle from a DSP?</p> <p>10 A You know, just in a -- in a super high</p> <p>11 level, a DSP will have seats that clients license</p> <p>12 for the housing of audiences that will then be</p> <p>13 utilized for the DSP to deploy media against those</p> <p>14 audiences.</p> <p>15 They also most times have data stores</p> <p>16 available to them that clients could come in and --</p> <p>17 and license -- or not license -- can utilize for</p> <p>18 audience selection for media to be deployed to</p> <p>19 them.</p> <p>20 We don't do any of that. It's not our</p> <p>21 business. Our business is pure identity and</p> <p>22 activation.</p> <p>23 Q Does Throttle itself provide HCP</p> <p>24 programmatic advertising services?</p> <p>25 A Well, in a broad sense, we provide</p>	<p style="text-align: right;">Page 41</p> <p>1 So an off line audience of healthcare</p> <p>2 professionals, let's say it's an audience of a</p> <p>3 hundred, and a specific advertiser would want to</p> <p>4 advertise to those hundred people, but only when</p> <p>5 they see them on Facebook or only when they see</p> <p>6 them on Trade Desk or only when they see them, you</p> <p>7 know, using their partnership with DeepIntent.</p> <p>8 We would utilize our capabilities to take</p> <p>9 that off line data and associate them to an online</p> <p>10 identifier that would crosswalk and associate</p> <p>11 itself with a platform identifier.</p> <p>12 And we'd send that data over to that</p> <p>13 platform, and it would now be available for that</p> <p>14 platform to understand what that data component is</p> <p>15 and how to recognize it in their stream -- their</p> <p>16 bidstream. And when it's recognized, they can</p> <p>17 deploy the media to it.</p> <p>18 Q In order for an HCP programmatic</p> <p>19 advertising campaign to occur, does a customer</p> <p>20 require the use of both Throttle and a DSP or can</p> <p>21 they just use Throttle?</p> <p>22 A No, they have to use Throttle and a DSP.</p> <p>23 Q Does Throttle's revenue come from</p> <p>24 providing HCP programmatic advertising services</p> <p>25 itself?</p>

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<p>1 A Partially.</p> <p>2 Q How so partially?</p> <p>3 A Well, some of the things that we do don't</p> <p>4 have anything to do with media deployment for DSPs.</p> <p>5 It has to do with identity and it has to do with</p> <p>6 data quality and things that are outside the actual</p> <p>7 deployment of media to an audience.</p> <p>8 So if you're speaking just specifically</p> <p>9 to advertising, it's partial. We get paid</p> <p>10 partially for that.</p> <p>11 Q And that partial revenue comes from the</p> <p>12 identity and data quality that you just discussed?</p> <p>13 A Yep, that's right.</p> <p>14 Q Previously you stated that some DSPs</p> <p>15 focus on HCPs and some were more agnostic; is that</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q How are HCP-focused DSPs different from</p> <p>19 agnostic DSPs?</p> <p>20 A You know, I think it's the nuances. You</p> <p>21 know, if -- if -- if you had asked me, you know,</p> <p>22 just off the street is there any differences, I</p> <p>23 would say, you know, there isn't, there really</p> <p>24 isn't a difference.</p> <p>25 Anybody who's not vertically focused in</p>	<p>1 there's a specific reason for healthcare.</p> <p>2 And for Throtle, I would seem -- I would</p> <p>3 -- I would think the same logic and thinking from</p> <p>4 a -- from a -- an executive standpoint that we</p> <p>5 apply goes for anybody in the DTC business -- or</p> <p>6 the DSP business.</p> <p>7 And that would be would we rather focus</p> <p>8 on one vertical and be experts at it and -- and</p> <p>9 know it really well or do we want to focus on 20</p> <p>10 verticals and be okay on all of those 20 verticals.</p> <p>11 The end product is basically the same,</p> <p>12 but we just felt comfortable because we're a</p> <p>13 smaller business to say let's just focus on</p> <p>14 healthcare.</p> <p>15 I particularly think that's the same way</p> <p>16 it is with a DSP, an SSP, measurement company, an</p> <p>17 analytics company, a social company, they all can</p> <p>18 make that pivot fairly straight and fairly easy.</p> <p>19 It's not that -- it's not that difficult to do.</p> <p>20 Q So you -- when you discuss generalist</p> <p>21 DSPs pivoting to HCP-focused DSPs, have -- what is</p> <p>22 your knowledge of this transition?</p> <p>23 A Yeah, I mean, first of all, you know, and</p> <p>24 I may be -- I may be wrong here and that's okay. I</p> <p>25 don't know a pure play HCP/DSP platform in</p>
Page 43	Page 45
<p>1 the healthcare space could easily become focused in</p> <p>2 the healthcare space with just a couple of -- of</p> <p>3 changes to the way they're going to manage data,</p> <p>4 treat data, maybe hook into specific publisher</p> <p>5 networks, et cetera.</p> <p>6 I don't think there's any magic to it. I</p> <p>7 don't think there's any walls of differentiation.</p> <p>8 I think the -- the base capabilities are identical.</p> <p>9 And, you know, just by way of identity,</p> <p>10 you know, how we made that pivot from being a</p> <p>11 vertically agnostic company to just focus on</p> <p>12 healthcare, we didn't do a whole heck of a lot in</p> <p>13 changing our infrastructure or our systems, we just</p> <p>14 started focusing on healthcare data.</p> <p>15 Yes, we had to become HIPAA certified.</p> <p>16 And, yes, we had to have SOC 2 come in and do a</p> <p>17 little bit more on the securities side.</p> <p>18 But those aren't, you know, barriers to</p> <p>19 entry, those are just things you have to do.</p> <p>20 So if you're asking me, you know, could a</p> <p>21 Trade Desk stop all of their other business and</p> <p>22 become healthcare focused, they can do that in two</p> <p>23 days if they wanted to. It's not that hard.</p> <p>24 You know, there's folks that decided they</p> <p>25 want to be in the healthcare business because</p>	<p>1 healthcare.</p> <p>2 I know that there is DSPs that focus on</p> <p>3 healthcare, which would mean they focus on HCPs and</p> <p>4 consumers.</p> <p>5 So the first thing I would -- I would</p> <p>6 suggest is that anybody who is making a switch to</p> <p>7 healthcare don't focus specifically on -- on HCPs</p> <p>8 specific on healthcare.</p> <p>9 Which mean across the broad spectrum of</p> <p>10 whatever healthcare data there is, whether it's</p> <p>11 HCPs, whether it's NPIs, whether it is consumers or</p> <p>12 whether it's, you know, professionals down the</p> <p>13 value chain of an HCP.</p> <p>14 So in that sense you just have to know</p> <p>15 that data structure and understand where that data</p> <p>16 is coming from in order to do the exact same thing</p> <p>17 you're doing today for potato chips from P&G.</p> <p>18 I mean, it's just -- it's the same</p> <p>19 process, it's just you're focusing on a different</p> <p>20 data set.</p> <p>21 Q And considering that Throtle itself is</p> <p>22 not a DSP, do you have personal experience in</p> <p>23 making that transition from a generalist DSP to an</p> <p>24 HCP-focused DSP?</p> <p>25 A No. As I said up front, I may be wrong.</p>

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<p>1 I said as far as my experience goes in doing it</p> <p>2 with Throtle, that's how I see it.</p> <p>3 You know, Throtle operates in a fairly</p> <p>4 small universe of identity providers. So for us it</p> <p>5 made a lot of sense.</p> <p>6 Since there's, you know, a multiple of</p> <p>7 providers in the DSP world, you know, the ones that</p> <p>8 are in that have to make a decision based on</p> <p>9 competitive reasons to -- to make the switch from</p> <p>10 an agnostic provider to a healthcare provider.</p> <p>11 Why they do it, why they don't do it,</p> <p>12 they have to have that answer on their own. But my</p> <p>13 -- my logic is it doesn't seem to be that difficult</p> <p>14 to do.</p> <p>15 Q You just stated that there was a small</p> <p>16 universe of identity providers. What do you mean</p> <p>17 by that?</p> <p>18 A I said there was a smaller.</p> <p>19 Q Smaller universe of identity providers,</p> <p>20 excuse me.</p> <p>21 A Yeah.</p> <p>22 Q What does that mean?</p> <p>23 A Well, it just means the folks that I</p> <p>24 compete with, the number of companies in the</p> <p>25 programmatic space that compete in the identity</p>	<p>1 They could be, of course, across the</p> <p>2 spectrum of professional talents there, whether</p> <p>3 they're oncologists or whether they're</p> <p>4 dermatologists or whatever.</p> <p>5 There's a -- you know, a universe of --</p> <p>6 I'm throwing out the number 5 million or so that</p> <p>7 make up the HCP, you know, marketable community.</p> <p>8 On the DTC side, it's consumers. It's</p> <p>9 all of us on this call. We all participate in a</p> <p>10 healthcare vertical by way of going to doctors,</p> <p>11 getting prescriptions, having a broken leg,</p> <p>12 whatever ailments we have.</p> <p>13 And so the two pieces of healthcare is</p> <p>14 you can market to doctors and folks within the</p> <p>15 healthcare profession to be aware of certain</p> <p>16 conditions, certain medications, certain issues</p> <p>17 going on in healthcare.</p> <p>18 Or you can choose to market to the</p> <p>19 consumers to say be aware of this healthcare</p> <p>20 condition coming around, this particular</p> <p>21 pharmaceutical coming around, this new treatment</p> <p>22 for this type of an ailment.</p> <p>23 And so you have two types of audiences</p> <p>24 that are being utilized in healthcare.</p> <p>25 And Throtle plays on both sides of that</p>
Page 47	Page 49
<p>1 world are a lot smaller than DSP.</p> <p>2 It's a lot more complicated to do, takes</p> <p>3 a lot more resources, you lose a hell of a lot more</p> <p>4 money up front and nobody wants to do that.</p> <p>5 So it's just, you know -- it's a game of</p> <p>6 -- of billion dollar companies, which we are not,</p> <p>7 and we're sword fighting every day.</p> <p>8 But, you know, it's a smaller universe of</p> <p>9 players that offer the services we offer.</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 Q I do not mean to test you, Mr. Chachko.</p> <p>18 Is there a difference in data between</p> <p>19 HCPs and consumers?</p> <p>20 A Yes.</p> <p>21 Q What is that difference?</p> <p>22 A Well, HCP are healthcare professionals,</p> <p>23 right? So those are people that have a</p> <p>24 professional profile, work in the healthcare</p> <p>25 industry, have NPIs that are associated with them.</p>	<p>1 continuum of -- of, you know, part of our business</p> <p>2 is HCP and part of it is DTC.</p> <p>3 And I would say that DTC is multiples</p> <p>4 larger than the HCP.</p> <p>5 Q So do advertisers reach HCPs differently</p> <p>6 than consumers?</p> <p>7 A Only with different data. The execution,</p> <p>8 the process is identical.</p> <p>9 But the data, where it originates, how</p> <p>10 you treat it, how you identify it, how you -- how</p> <p>11 you perfect it, how you -- how you make it</p> <p>12 accurate, those two pieces are -- are -- I don't</p> <p>13 want to say vastly different, but they're very</p> <p>14 different.</p> <p>15 But once you get the data correct and get</p> <p>16 it to a DSP, it's pretty much identical.</p> <p>17 Q What is the difference in -- in the data?</p> <p>18 A Well, as I -- as I testified earlier, you</p> <p>19 know, healthcare professional data comes in and</p> <p>20 it's kind of dirty. You know, you got a lot of</p> <p>21 people that change practices, leave practices, come</p> <p>22 into practices.</p> <p>23 The government keeps an NPI. They update</p> <p>24 it, you know, not as frequently as they should.</p> <p>25 NPIs get shared.</p>

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<p>1 You know, office practices move from 2 location to location. People change from hospital 3 to hospital.</p> <p>4 So there's a lot of movement in 5 healthcare data in the professional side.</p> <p>6 You can imagine when you're trying to 7 track them and -- and -- and send them programmatic 8 marketing or advertising, making sure you get the 9 right message to the right recipient all is 10 dependent on making sure that you have the right 11 audience to begin with.</p> <p>12 So that's our job. That's what Throttle 13 does. Throttle makes sure that that data is as 14 accurate as it possibly can be.</p> <p>15 On the consumer side, it's as equally 16 dirty as the HCP side, but magnify the audiences 17 by, you know, 50. Maybe more. Oh, I'm sorry, 18 by -- yeah, by 50.</p> <p>19 And, you know, fortunately on the 20 consumer side you have a postal address that is a 21 fixed address that when people change their 22 physical address, that particular address travels 23 with them to the new address. The person travels.</p> <p>24 And oftentimes phone numbers, email 25 addresses and other identifiers do not change.</p>	<p>1 media associated with them, they made this action, 2 and from this action we know it was the right 3 person in that audience.</p> <p>4 And then this person actually went to 5 this doctor or went to this pharmacy or went to 6 this location and actually got services or spent 7 money on that particular product. And you kind of 8 create the full circle.</p> <p>9 And once you do that, then you have a 10 very solid system in place.</p> <p>11 But it all starts, you know, at the tip 12 of the spear and that's -- that's the identity 13 piece.</p> <p>14 Q Do advertisers seek to reach HCPs on a 15 one-to-one basis?</p> <p>16 A Yes.</p> <p>17 Q Do advertisers seek to reach the DTC side 18 on a one-to-one basis?</p> <p>19 A Yes. There -- you know, I'll -- I don't 20 know if I should educate you, but I will.</p> <p>21 There are advertisers that -- not on the 22 HCP side, on the DT side, say, we'd prefer to 23 advertise like a shotgun approach versus a laser 24 approach.</p> <p>25 So instead of one-on-one, they prefer to</p>
Page 51	Page 53
<p>1 You will get phone numbers that change 2 often, you will get physical addresses that change 3 often, and IP addresses that change often.</p> <p>4 So on the HCP side you have a whole 5 schema of data treatment versus the DTC side which 6 has a whole different scheme of data treatment.</p> <p>7 No matter what data set we get in from 8 whatever customer, whatever pharma, whatever 9 agency, whoever it may be, depending on what side 10 of that data structure they need to be, we process 11 the data accordingly and then send it exactly the 12 same way to every single DSP.</p> <p>13 The only thing that's changing in a DSP 14 is the file layout. They wanted -- they wanted ABC 15 on this side and this guy wants it CBA on that 16 side. That's basically the only difference.</p> <p>17 But, you know, the -- the critical 18 services we provide is the data fixing and 19 structures up front so the advertisers can get 20 accurate marketing.</p> <p>21 And then the modelers and measurement 22 companies and analytic companies on the back end 23 can get accurate data that they can utilize across 24 the whole continuum and attribution cycle of saying 25 this person was directly targeted, this was the</p>	<p>1 do it a little bit more shotgunish because of just 2 HIPAA concerns.</p> <p>3 They want to know that their -- their -- 4 their target is within that cluster, but they're 5 okay if that cluster has a couple of individuals 6 that are not really their necessary target.</p> <p>7 But for the most part, it's all 8 one-to-one. They'll just throw a lot of known un-- 9 known targets that aren't the correct targets just 10 because they want a little bit less of a -- a known 11 audience in aggregate.</p> <p>12 I don't know if that makes sense, but 13 it's a nuance in the DTC side.</p> <p>14 Q When you talk about fixing the data, what 15 do you mean?</p> <p>16 A Well, as I said, you know, HCP data comes 17 in all across the -- you know, the spectrum of 18 problems.</p> <p>19 Our capabilities and our -- our 20 intellectual property allows for us to be able to 21 say, no, we saw that doctor, he moved last week to 22 this new location, so that information is slightly 23 wrong, this is the updated information. We'll fix 24 their information to -- to give them the updated 25 information.</p>

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<p>1 Same goes for the identifiers. They may</p> <p>2 have two email addresses, but the provider, you</p> <p>3 know, our client, only has one email address.</p> <p>4 Our client may want to do connected</p> <p>5 television and doesn't have an IP address but we</p> <p>6 have the IP address.</p> <p>7 So we'll append the IP address to the --</p> <p>8 the client's audience set and be able to expand</p> <p>9 their data and be able to perfect their data in</p> <p>10 ways they have no idea of how to do it.</p> <p>11 The same exact sequence is on the DTC</p> <p>12 side, there's no difference. Instead of calling</p> <p>13 them a doctor, call them a DTC, the same process</p> <p>14 takes place.</p> <p>█ █ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ █ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p>	<p>1 don't, you know, issue reports. We are -- we are</p> <p>2 the movers of the data.</p> <p>3 So we'll connect the -- you know, the --</p> <p>4 the platform information with the client facility</p> <p>5 where they want that data to be deposited, in the</p> <p>6 form that they want it to be deposited, and in the</p> <p>7 frequency they want it to be deposited.</p> <p>8 They may want it every 15 minutes, they</p> <p>9 want -- maybe want it once a day, they may want it</p> <p>10 once a week or once a month. We're just moving the</p> <p>11 data.</p> <p>12 So if -- and I know this is a really dumb</p> <p>13 analogy but I'll do it anyway.</p> <p>14 If you had a -- you know, a warehouse of</p> <p>15 products and you wanted to have it, you know, sent</p> <p>16 around to a bunch of different locations so those</p> <p>17 locations can sell it, you know, we take the data</p> <p>18 from the warehouse and we're the truckers that move</p> <p>19 it to the different locations.</p> <p>20 So from the publisher site or the DSP,</p> <p>21 we're taking all that data and moving it to</p> <p>22 analytical companies, measurement companies,</p> <p>23 reporting companies, back to the -- you know, the</p> <p>24 original advertiser.</p> <p>25 So we're just the movers of the data. We</p>
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<p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>█ [REDACTED]</p> <p>12 Q Previously you stated that Throttle does</p> <p>13 not provide the end result of measurement, that</p> <p>14 Throttle plays a support role. Do you remember</p> <p>15 that?</p> <p>16 A Yes.</p> <p>17 MR. SULLIVAN: Object to the form.</p> <p>18 BY MR. GAO:</p> <p>19 Q What aspects of measurement does Throttle</p> <p>20 not provide that is necessary for measurement?</p> <p>21 A We don't --</p> <p>22 MR. SULLIVAN: Object to the form.</p> <p>23 A We don't do any of the -- the</p> <p>24 measurement-based work. We don't come up with</p> <p>25 conclusions. We don't come up with results. We</p>	<p>1 make sure it's packaged the right way, we make sure</p> <p>2 it's delivered the right way, but we don't have any</p> <p>3 idea what the results of that data means when the</p> <p>4 end company or end user gets it to modify it for</p> <p>5 reporting analytical purposes, charts, you know,</p> <p>6 graphs, and all the other stuff they do with it.</p> <p>7 BY MR. GAO:</p> <p>8 Q Previously when you stated that</p> <p>9 advertisers sometime reach DTC on a one-to-one</p> <p>10 basis, in those instances are they targeting</p> <p>11 consumers on a one-to-one basis by name?</p> <p>12 MR. SULLIVAN: Object to the form.</p> <p>13 A In the HCP side, it's often appropriate</p> <p>14 and legal to use surnames and first names to direct</p> <p>15 media.</p> <p>16 On the DTC side, depending on the product</p> <p>17 that you're -- you're offering, first name can or</p> <p>18 cannot be used based on a bunch of different laws.</p> <p>19 So it really needs to get ridiculously</p> <p>20 granular for me to answer that question you want.</p> <p>21 So I would say it depends on really the</p> <p>22 application that's being -- being used at that</p> <p>23 time. There's a huge amount of legislation around</p> <p>24 it as you guys probably know.</p> <p>25 But when it -- when it becomes HIPAA</p>

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<p>1 protected data, we go through tokenization, which</p> <p>2 is a complete separate set of -- of identity</p> <p>3 technology. And at that point it becomes</p> <p>4 anonymized and impossible to be de-anonymized.</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 BY MR. GAO:</p> <p>10 Q I'd like for you to pull up the exhibit</p> <p>11 that you looked at previously. I believe this has</p> <p>12 been marked by Defendant as Exhibit Throttle 1 with</p> <p>13 the Bate stamp Throttle-0004375.</p> <p>14 Let me know once you've pulled that back</p> <p>15 up.</p> <p>16 MR. VORRASI: Yan, is that something you</p> <p>17 can put on the screen like Luke did?</p> <p>18 MR. GAO: So, unfortunately, I have kind</p> <p>19 of a dual setup here. I'm not able to pull it up,</p> <p>20 I apologize.</p> <p>21 Is there any way that we can --</p> <p>22 otherwise, this is a small document. I think I'll</p> <p>23 -- I'm able to email it if that works for everyone</p> <p>24 as well.</p> <p>25 MR. VORRASI: Do you want to put it in</p>	<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>
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<p>1 the chat?</p> <p>2 MR. GAO: So, once again, this setup and</p> <p>3 my video, I'm not able to do that. And -- and -- I</p> <p>4 think email would work best.</p> <p>5 And if that works -- let's go off the</p> <p>6 record for a minute and then we can figure this</p> <p>7 out.</p> <p>8 VIDEO TECHNICIAN: Going off the record.</p> <p>9 The time is 2:23 p m.</p> <p>10 (Off the record.)</p> <p>11 VIDEO TECHNICIAN: Going back on the</p> <p>12 record. The time is 2:28 p m.</p> <p>13 BY MR. GAO:</p> <p>14 Q Welcome back, Mr. Chachko.</p> <p>15 During the break I sent out an email with</p> <p>16 Defendant's exhibit. Do you have the spreadsheet</p> <p>17 pulled up?</p> <p>18 A I have the spreadsheet and I have a PDF.</p> <p>19 Q Yes, I sent over two files. We will get</p> <p>20 to the PDF shortly.</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>

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1 This is a document that's Bate stamped

2 Throtle-0000001. This is a document that we have

3 shrank down to three pages due to the voluminous

4 size of the original document that starts with Bate

5 stamp Throtle-0000001 which is over 4000 pages

6 long.

7 Since we're unable to load such a large

8 document to Exhibit Share or email, PX4060 focuses

9 on three pages in that large document.

10 I encourage all parties to also open up

11 the native version of Throtle-000001 if you have it

12 available.

13 BY MR. GAO:

14 Q Mr. Chachko, please go to the first page

15 of PX4060, and let me know once you are there.

16 A I'm there.

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

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25 [REDACTED]

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<p>[REDACTED]</p>	<p>[REDACTED]</p> <p>9 MR. SULLIVAN: The spreadsheets?</p> <p>10 BY MR. GAO:</p> <p>11 Q Yes, the spreadsheet, Throttle Exhibit 1.</p> <p>12 Let me know once you have that pulled up.</p> <p>13 A I'm good.</p> <p>14 Q Mr. Chachko, is this a document that you</p> <p>15 keep in the ordinary course of business?</p> <p>16 A It's a subset of a document I do, yes.</p> <p>17 Q So previously you testified: "when Ken</p> <p>18 asked me to identify the healthcare clients we</p> <p>19 currently have, what the revenue we're generating</p> <p>20 by each of these clients, and the type of revenue.</p> <p>21 "So I assembled this last week just to</p> <p>22 give him a quick snapshot of what we have, its</p> <p>23 current clients, and what we have as upcoming</p> <p>24 clients."</p> <p>25 This is what you testified, correct?</p>
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<p>[REDACTED]</p>	<p>1 A I assume that's what I said. I -- I</p> <p>2 don't have that kind of recall. I assume it is,</p> <p>3 yeah.</p> <p>4 Q So this was assembled last week in</p> <p>5 response to subpoena.</p> <p>6 A Yes.</p> <p>7 MR. GAO: Okay. Let's go off the record.</p> <p>8 Take a short break.</p> <p>9 VIDEO TECHNICIAN: Going off the record.</p> <p>10 The time is 2:42 p m.</p> <p>11 (Recess taken.)</p> <p>12 VIDEO TECHNICIAN: Going back on the</p> <p>13 record. The time is 2:49 p m.</p> <p>14 BY MR. GAO:</p> <p>15 Q Welcome back, Mr. Chachko.</p> <p>16 Earlier with Defendant you mentioned</p> <p>17 Google. Are you familiar with Google's policies on</p> <p>18 targeted healthcare advertisements?</p> <p>19 A Not intimately, no.</p> <p>20 MR. GAO: Those are all the questions I</p> <p>21 had right now. I'd like to reserve the rest of the</p> <p>22 time.</p> <p>23 MR. SULLIVAN: Okay. I have some</p> <p>24 additional questions and I'm ready to go right now.</p> <p>25</p>

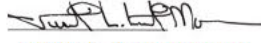
<p style="text-align: right;">Page 70</p> <p>1 FURTHER EXAMINATION</p> <p>2 BY MR. SULLIVAN:</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 [REDACTED]</p> <p>11 [REDACTED]</p> <p>12 [REDACTED]</p> <p>13 [REDACTED]</p> <p>14 [REDACTED]</p> <p>15 [REDACTED]</p> <p>16 [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 [REDACTED]</p> <p>25 [REDACTED]</p>	<p style="text-align: right;">Page 72</p> <p>1 Q Okay. Is your understanding of how</p> <p>2 programmatic advertising works informed by the fact</p> <p>3 that Throtle works with both general DSPs and</p> <p>4 healthcare-specific DSPs?</p> <p>5 MR. GAO: Objection, form.</p> <p>6 A Yes, I mean, you know, from a -- from a</p> <p>7 company standpoint we hold dev meetings a couple of</p> <p>8 times a week. And --</p> <p>9 THE COURT REPORTER: I'm sorry, what kind</p> <p>10 of meetings?</p> <p>11 A Dev, D-E-V, development meetings, several</p> <p>12 times a week. And that review the priorities and</p> <p>13 the existing clients and the -- the demands that</p> <p>14 they need on a weekly basis to make sure that we</p> <p>15 get everything through the system.</p> <p>16 So through those meetings, prioritization</p> <p>17 and, you know, the specific solutions we're working</p> <p>18 with, you know, I -- I get a good handle on what --</p> <p>19 what DSPs -- what DSP is doing what and who is</p> <p>20 competing with who and what types of things are</p> <p>21 they strong in, what types of things they're weak</p> <p>22 in.</p> <p>23 And as I said, you know, Throtle plays a</p> <p>24 unique position in this eco system. Whereas, we</p> <p>25 get to see a lot of the players that both compete</p>
<p style="text-align: right;">Page 71</p> <p>1 [REDACTED]</p> <p>2 [REDACTED]</p> <p>3 [REDACTED]</p> <p>4 [REDACTED]</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 general DSPs and healthcare DSPs. Do you remember</p> <p>9 that?</p> <p>10 A I do.</p> <p>11 Q And in your work at Throtle, do you have</p> <p>12 significant interactions with both general DSPs and</p> <p>13 healthcare DSPs?</p> <p>14 A We do.</p> <p>15 Q Through your work at Throtle, do you have</p> <p>16 significant knowledge about the programmatic</p> <p>17 advertising process and DSP's role in it?</p> <p>18 MR. GAO: Objection, form.</p> <p>19 A Me, as an individual, I don't have as</p> <p>20 deep as knowledge as the company has through other</p> <p>21 employees and folks that, you know, are -- are more</p> <p>22 intimately involved with the -- the technology</p> <p>23 thereof. But I've got a fairly strong</p> <p>24 understanding of how all this stuff works.</p> <p>25 BY MR. SULLIVAN:</p>	<p style="text-align: right;">Page 73</p> <p>1 against each other and work with each other.</p> <p>2 BY MR. SULLIVAN:</p> <p>3 Q Do you agree that given the identity</p> <p>4 services for HCP programmatic advertising that</p> <p>5 Throtle provides, it has significant visibility</p> <p>6 into the HC programmatic advertising industry?</p> <p>7 MR. GAO: Objection, form, leading.</p> <p>8 A Very much so, yes.</p> <p>9 BY MR. SULLIVAN:</p> <p>10 Q Do you agree that if a Throtle customer</p> <p>11 brings an NPI list to Throtle to activate on a DSP,</p> <p>12 that customer can pick between dozens of DSPs?</p> <p>13 MR. GAO: Objection, form, leading.</p> <p>14 A They often do, yes.</p> <p>15 BY MR. SULLIVAN:</p> <p>16 Q And do the DSPs that a customer of</p> <p>17 Throtle can choose from to activate an HCP audience</p> <p>18 include both general DSPs and healthcare-specific</p> <p>19 DSPs?</p> <p>20 MR. GAO: Objection, form, leading.</p> <p>21 A In the majority of the time, yes.</p> <p>22 BY MR. SULLIVAN:</p> <p>23 Q During your testimony with the FTC, you</p> <p>24 mentioned the mechanics of DSPs executing</p> <p>25 advertising campaigns to audiences. Do you</p>

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[illegible]

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Category	Value (approximate percentage)
1	85
2	90
3	65
4	55
5	95
6	50
7	45
8	10
9	85
10	95
11	98
12	95
13	35
14	10
15	85
16	45
17	10
18	95
19	90
20	80

<p style="text-align: right;">Page 82</p> <p>1 under the scheduler.</p> <p>2 But we're designating the entirety of</p> <p>3 this testimony as confidential. And we'll follow</p> <p>4 the protocols set forth by the court and any future</p> <p>5 court orders concerning the use of this testimony</p> <p>6 or our documents.</p> <p>7 We've designated all of the Throtle</p> <p>8 documents as confidential under the protective</p> <p>9 order. Including in your briefing, your expert</p> <p>10 reports and any use at any, you know, trial</p> <p>11 proceeding whether that be in federal court or the</p> <p>12 Part 3 action.</p> <p>13 I just want to get that on the record. I</p> <p>14 know there are court rules about that, but Throtle</p> <p>15 takes the confidentiality of this testimony and its</p> <p>16 documents very seriously.</p> <p>17 I think that's all we have for now.</p> <p>18 VIDEO TECHNICIAN: We are off the record</p> <p>19 at 3:09 p.m.</p> <p>20 This concludes today's testimony given by</p> <p>21 Paul Chachko.</p> <p>22 The total number of media units used is</p> <p>23 seven and will be retained by Veritext.</p> <p>24 (Deposition concluded at 3:09 p.m.)</p> <p>25 (Signature reserved.)</p>	<p style="text-align: right;">Page 84</p> <p>1 CERTIFICATE</p> <p>2 Deposition of: PAUL CHACHKO</p> <p>3 Date of Deposition: OCTOBER 24, 2023</p> <p>4 STATE OF GEORGIA:</p> <p>5</p> <p>6 I hereby certify that the foregoing</p> <p>7 transcript was stenographically recorded by me</p> <p>8 via Zoom as stated in the caption. The deponent</p> <p>9 was duly sworn to tell the truth, the whole truth,</p> <p>10 and nothing but the truth. And the colloquies,</p> <p>11 statements, questions and answers thereto were</p> <p>12 reduced to typewriting under my direction and</p> <p>13 supervision and the deposition is a true and</p> <p>14 correct record, to the best of my ability, of</p> <p>15 the testimony/evidence given by the deponent.</p> <p>16 I further certify that I am not a</p> <p>17 relative or employee or attorney or counsel to</p> <p>18 any of the parties in the case, nor am I a</p> <p>19 relative or employee of such attorney or counsel,</p> <p>20 nor am I financially interested in the action.</p> <p>21 This, the 25th day of October 2023.</p> <p>22</p> <p>23</p> <p>24  Judith L. Leitz Moran, CCR-B-2312</p> <p>25 Registered Professional Reporter</p>
<p style="text-align: right;">Page 83</p> <p>1 The following reporter and firm</p> <p>2 disclosures were presented by me at this proceeding</p> <p>3 for review by counsel:</p> <p>4 REPORTER DISCLOSURES</p> <p>5 The following representations and</p> <p>6 disclosures are made in compliance with Georgia</p> <p>7 Law, more specifically:</p> <p>8 Article 10 (B) of the Rules and</p> <p>9 Regulations of the Board of Court Reporting</p> <p>10 (disclosure forms)</p> <p>11 OCGA Sections 9-11-28 (c)</p> <p>12 (disqualification of reporter for financial</p> <p>13 interest)</p> <p>14 OCGA Sections 15-14-37 (a) and (b)</p> <p>15 (prohibitions against contracts except on a</p> <p>16 case-by-case basis)</p> <p>17 - I am a certified court reporter in the state of</p> <p>18 Georgia</p> <p>19 - I am a subcontractor for Veritext</p> <p>20 - I have been assigned to make a complete and</p> <p>21 accurate record of these proceedings</p> <p>22 - I have no relationship of interest in the matter</p> <p>23 on which I am about to report which would</p> <p>24 disqualify me from making a verbatim record or</p> <p>25 maintaining my obligation of impartiality in</p> <p>compliance with the Code of Professional Ethics</p> <p>- I have no direct contract with any party in this</p> <p>action, and my compensation is determined solely by</p> <p>the terms of my subcontractor agreement</p> <p>FIRM DISCLOSURES</p> <p>- Veritext was contacted to provide reporting</p> <p>services by the noticing or taking attorney in this</p> <p>matter</p> <p>- There is no agreement in place that is prohibited</p> <p>by OCGA 15-14-37(a) and (b). Any case-specific</p> <p>discounts are automatically applied to all parties,</p> <p>at such time as any party receives a discount</p> <p>- Transcripts: The transcript of this proceeding</p> <p>as produced will be a true, correct, and complete</p> <p>record of the colloquies, questions, and answers as</p> <p>submitted by the certified court reporter</p> <p>- Exhibits: No changes will be made to the</p> <p>exhibits as submitted by the reporter, attorneys,</p> <p>or witnesses</p> <p>- Password-Protected Access: Transcripts and</p> <p>exhibits relating to this proceeding will be</p> <p>uploaded to a password-protected repository, to</p> <p>which all ordering parties will have access</p>	<p style="text-align: right;">Page 85</p> <p>1 FIRM CERTIFICATE AND DISCLOSURE</p> <p>2</p> <p>3 Veritext represents that the foregoing transcript</p> <p>4 as produced by our Production Coordinators, Georgia</p> <p>5 Certified Notaries, is a true, correct and complete</p> <p>6 transcript of the colloquies, questions and answers</p> <p>7 as submitted by the certified court reporter in</p> <p>8 this case. Veritext further represents that the</p> <p>9 attached exhibits, if any, are a true, correct and</p> <p>10 complete copy as submitted by the certified</p> <p>11 reporter, attorneys or witness in this case; and</p> <p>12 that the exhibits were handled and produced</p> <p>13 exclusively through our Production Coordinators,</p> <p>14 Georgia Certified Notaries. Copies of notarized</p> <p>15 production certificates related to this proceeding</p> <p>16 are available upon request to</p> <p>17 production@veritext.com</p> <p>18 Veritext is not taking this deposition under any</p> <p>19 relationship that is prohibited by OCGA 15-14-37</p> <p>20 (a) and (b). Case-specific discounts are</p> <p>21 automatically applied to all parties, at such time</p> <p>22 as any party receives a discount. Ancillary</p> <p>23 services such as calendar and financial reports are</p> <p>24 available to all parties upon request.</p> <p>25</p>

<p style="text-align: right;">Page 86</p> <p>1 Kenneth M. Vorrasi, Esquire 2 kenneth.vorrasi@faegredrinker.com 3 October 25th, 2023 4 RE:Federal Trade Commission v. IQVIA Holdings, Inc., And Propel 5 10/24/2023, Paul Chachko (#6277132) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 Deponent and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 (erratas-cs@veritext.com). 16 17 Return completed errata within 30 days from 18 receipt of testimony. 19 If the witness fails to do so within the time 20 allotted, the transcript may be used as if signed. 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>	<p style="text-align: right;">Page 88</p> <p>1 Federal Trade Commission v. IQVIA Holdings, Inc., And Propel 2 Paul Chachko (#6277132) 3 ACKNOWLEDGEMENT OF DEPONENT 4 I, Paul Chachko, do hereby declare that I 5 have read the foregoing transcript, I have made any 6 corrections, additions, or changes I deemed necessary as 7 noted above to be appended hereto, and that the same is 8 a true, correct and complete transcript of the testimony 9 given by me. 10 11 _____ 12 Paul Chachko Date 13 *If notary is required 14 SUBSCRIBED AND SWORN TO BEFORE ME THIS 15 _____ DAY OF _____, 20____. 16 17 18 _____ 19 NOTARY PUBLIC 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 87</p> <p>1 Federal Trade Commission v. IQVIA Holdings, Inc., And Propel 2 Paul Chachko (#6277132) 3 E R R A T A S H E E T 4 PAGE____ LINE____ CHANGE_____ 5 _____ 6 REASON_____ 7 PAGE____ LINE____ CHANGE_____ 8 _____ 9 REASON_____ 10 PAGE____ LINE____ CHANGE_____ 11 _____ 12 REASON_____ 13 PAGE____ LINE____ CHANGE_____ 14 _____ 15 REASON_____ 16 PAGE____ LINE____ CHANGE_____ 17 _____ 18 REASON_____ 19 PAGE____ LINE____ CHANGE_____ 20 _____ 21 REASON_____ 22 _____ 23 _____ 24 Paul Chachko Date 25</p>	

[& - accurate]

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[accurate - apis]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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